MAY 15 1987

Removal at Dayton Tire & Rubber Co., Dayton, Ohio
ACTION MEMORANDUM

Valdas V. Adamkus
Regional Administrator

J. Winston Porter, Assistant Administrator
for Solid Waste & Emergency Response (WH-562A)

THRU: Timothy Fields, Director
Emergency Response Division (WH-548B)

Purpose

The purpose of this memorandum is to obtain a waiver of the $2,000,000 limitation on removal actions and to increase the authorized ceiling on the removal action at the Dayton Tire Company at Dayton, Ohio, from $240,000 to $3,250,000.

STATUTORY CRITERIA

Section 104(c)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) limits Federal emergency response to $2 million, unless three criteria are met.

1. Continued response actions are immediately required to mitigate an emergency.

2. There is an immediate risk to public health or the environment.

3. Such assistance will not otherwise be provided on a timely basis.

BACKGROUND

On April 3, 1987, the Ohio Environmental Protection Agency (OEPA) reported that there had been a release of up to 1,000 gallons of oil from four large transformers near Wolf Creek in Dayton, Ohio. Wolf Creek is a tributary to the Great Miami River. The transformers were at the site of the Dayton Tire Company, which went out of business during 1986. The area around the transformers was saturated with oil, and a slick was on the stream. The concentration of PCB in the oil was 22,000 parts per million (ppm). The OEPA had hired a contractor, Leston Sewer Company, who boomed the stream and started to skim oil. It was clear that the response could require more than $25,000 that the OEPA was authorized to spend. Therefore, the OEPA requested assistance from the United States Environmental Protection Agency (U.S. EPA).

On-Scene Coordinator (OSC), Mr. Robert Bowlus, was dispatched and arrived on-scene during the evening of April 3, 1987. He was verbally authorized to expend up to an additional $40,000. The Technical Assistance Team (TAT) contractor responded to assist the OSC, and the Emergency Response Contracting Services (ERCS) contractor, PEI, was activiated. O.H. Materials Company responded as the subcontractor for PEI, since the scope of the response was beyond the resources of the Leston Sewer Company.

The stream was boomed but, since the water was high, some oil escaped. The sediments are believed to be contaminated up to a mile downstream. Over 200 gallons of free oil were recovered from around the transformers, and seventy 55-gallon drums of oil/water were recovered from the stream. Oil was no longer entering the stream, but precipitation could cause a further discharge, so the booms were left in place.

The OSC found that there are many more transformers and capacitors inside the Dayton Tire Company building and on its roof. Many have been drained, and there is a substantial amount of PCB oils on the floors of the building. The building also contains a substantial quantity of asbestos-lined piping in poor condition. There is considerable evidence of vandalism in the building. Due to the unanticipated widespread contamination found in the building, the cost of characterizing and controlling the site was greater than estimated. The OSC requested an additional $10,000, which was verbally approved by Mr. Covington on April 7, 1987.

The Dayton Tire Company facility is a large four-story building, approximately 1,000 feet long and 500 feet wide. It contains 37 large transformers, most of which were PCB transformers, and over 50 large capacitors which contain very high concentrations of PCB. There are eight 12,000-gallon storage tanks in the basement, three buried railroad tank cars containing sludges, many large mixing vats, and approximately one hundred 55-gallon drums whose contents are, as yet, unknown. It also contains thousands of feet of 12" and 8" steam lines which were insulated. Much of this insulation has been torn down by scavengers. A team expert in asbestos removal collected ten samples of this material, and found seven to be primarily asbestos, and three to be primarily fiberglass with asbestos layers. This material is friable and is clearly a source of airborne asbestos fibers. Some of it has been crushed by vehicles driven into the building by scavengers.

On April 14, 1987, the OSC returned to the site because precipitation had caused additional oil discharges to the stream. On April 15, 1987, an additional $40,000 was approved to control these new discharges. These new discharges could not be attributed to drained transformers, so a search was made to determine the source. A large network of underdrains and sewers, with a small pump station which drains the area beneath and around the building, was found. This system is heavily contaminated and will discharge oil whenever there is significant precipitation.

On April 17, 1987, an additional $200,000 was authorized to control discharges from the drainage system, initiate cleanup of the building, and complete extent of contamination surveys.

The Dayton Tire Company is not on the National Priorities List.

THREAT

Section 300.65 of the National Contingency Plan authorizes removal action where there are "Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals or food chain," and where there are "high levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate." PCBs are persistent hazardous substances, capable of causing both short-term and long-term local and systemic health effects in humans. They are known to bioaccumulate in the food chain and are suspected human carcinogens.

Airborne asbestos is a human carcinogen.

ENFORCEMENT

The Dayton Tire Company was a wholly owned subsidiary of Firestone Tire & Rubber Co. when it went out of business. The site was sold to J-V Properties during July 1981. Machinery Merchants Inc., is in the process of selling the tire making equipment, which has considerable value. J-V Properties and Machinery Merchants have partners in common. The property itself, which is in metropolitan Dayton, also has considerable value. Unilateral Administrative Orders will be issued to all of the potential responsible parties.

The manner in which the Dayton Tire Company site meets the criteria for waiver of the $2,000,000 limitation is as follows:

1) Continued response actions are immediately required to mitigate an emergency. All of the proposed actions are required to eliminate the direct contact threat and the threat to the environment, with the exception of the disposal of the decontaminated transformer carcasses. If not disposed of, the carcasses would constitute an attractive nuisance which could cause injury to unauthorized personnel, who may enter the site after completion of the project. If the $2,000,000 limitation is not waived, a substantial amount of hazardous materials will remain on the site.

2) There is an immediate risk to the public health or the environment. The discharge of high concentrations of PCBs from the site constitutes a risk to the public health and the environment. The presence of large quantities of friable asbestos, which may become airborne and be carried off-site, constitutes an immediate risk to the public health. These risks cannot be fully abated, unless the $2,000,000 limitation is waived.

3) Such assistance will not otherwise be provided on a timely basis. The OEPA has exhausted its authority to expend emergency funds on the site. None of the responsible parties has indicated a willingness to undertake the work. The site is not on the National Priorities list, so it will require several years before remedial action could be taken. It is anticipated that the removal action can be completed in 4 months.

PROPOSED ACTION

The OSC will continue the action initiated by the OEPA to contain and remove the oil from Wolf Creek, and will take action to prevent further leaching from the saturated soils and the sewer system. The extent of contamination survey of the stream, the soils around the site and the building will be completed. Soils outside the fenceline with PCB concentrations greater than 10 ppm and soils within the fenceline and stream sediments with concentrations of PCBs greater than 25 ppm will be removed and disposed. There are areas where scavengers have attempted to remove insulation by burning. These areas will be sampled for dioxins and dibenzofurans. Site security will be established, and a site safety plan implemented. The asbestos in the building will be removed and disposed of in a approved landfill. The capacitors will be removed, shredded and incinerated at an approved incinerator. The PCB-contaminated oils will be either chemically decontaminated or incinerated off-site. The contents of the drains, railroad cars and storage tanks will be characterized and disposed of in an appropriate manner. Transformer carcasses will be decontaminated and disposed of in a suitable landfill. PCB-contaminated soils will be removed and disposed of in an appropriate manner. The drainage system will be removed, where possible, and flushed to minimize future discharges of oil. Contaminated portions of walls and floors in the building will be decontaminated.

This action is consistent with any long-term remedial action that may be taken on the site.

A detailed budget is provided as Attachment A.

RECOMMENDATION

Because conditions at the Dayton Tire Company in Dayton, Ohio, meet the National Contingency Plan, paragraph 300.65, criteria for removals and the Section 104(c)(1) criteria for waiver of the $2,000,000 limitation on removal actions, I recommend that you approve the waiver and increase the project ceiling from $200,000 to $3,860,000.

/s/
Original signed by:
Valdas V. Adamkus
/s/ Frank M. Covington

Valdas V. Adamkus

APPROVED: _____ DATE: _____
ASSISTANT ADMINISTRATOR
FOR SOLID WASTE & EMERGENCY RESPONSE

DISAPPROVED: _____ DATE: _____
ASSISTANT ADMINISTRATOR
FOR SOLID WASTE & EMERGENCY RESPONSE

R.BOUDEN:lrt:5HR-11/ERS 4/20/87 Disc 23

5/19/87

ATTACHMENT A

Estimate of Removal Costs
Dayton Tire Company
Dayton, Ohio

A.	SITE SECURITY	
	° Security Guard for 4 months	$36,000
	° Fencing repair, warning signs, and miscellaneous	4,000
	15% contingency	6,000
	SUBTOTAL	$46,000
B.	SITE SUPPORT	
	° Two office trailers with support package for 4 months	$20,000
	° Utilities (telephone and electricity)	20,000
	° Decon Trailer	30,000
	° Equipment/Storage area rehabilitation	5,000
	15% contingency	11,000
	SUBTOTAL	$86,000
C.	SAMPLING	
1.	Extent of Contamination (exterior on-site)	
	° 200 samples analyzed for PCBs	$20,000
2.	Characterize zones of contamination (interior on-site)	
	° 100 samples analyzed for PCBs	10,000
	° 10 samples analyzed for Dioxins/Furans	10,000
	° Other potential contaminants	10,000
3.	Extent of Contamination (interior hot spots)	
	° 200 samples analyzed for PCBs	20,000
4.	Waste Stream Characterization	
	° 100 samples analyzed for PCBs	10,000
5.	Verification of Decontamination	
	° 20 samples analyzed for PCBs	2,000
	15% contingency	12,000
	SUBTOTAL	$84,000

D. DECONTAMINATION, REMOVAL, AND HANDLING

1. Transformer and Capacitor Carcasses and Related Material		
° Staging transformer and capacitor carcasses (Cranes, Bobcats, Jackhammers)	$	50,000
° Low level contamination (<50 ppm PCB) shredded metal and crushed transformer carcasses.		150,000
2. Walls, Floors, and Roofs		
° Scrape and solvent rinse in Level B		250,000
° Two-coat Epoxy sealant paint		10,000
3. Soils and other Solid PCBs		
° 150 cu yd of on-site soils (excavate and stage)		15,000
4. Liquid PCBs		
° Collect contaminated liquids (aqueous and oil product)		25,000
° Decon and rinse water		10,000
5. Hazardous Ash (DIOXINS & FURANS)		UNKNOWN
6. Asbestos		
° Collect and store loose asbestos		50,000
° Remove from 12" steam line		250,000
° Remove from 8" steam line & feeder lines		250,000
7. Other Materials		
° Sludges in three buried PP tank cars		60,000
° Unknown drums (100 est.)		50,000
° Large mixing vats for rubber compounding		UNKNOWN
° Eight 12,000-gallon basement tanks		UNKNOWN
15% contingency		176,000
SUBTOTAL		$1,347,000

E. TRANSPORTATION AND DISPOSAL

$2,000/transformer	$	74,000
° soils $400/cu yd		60,000
° 200 cu yd of shredded metal, crushed transformers, debris, and protective clothing		80,000
° 40,000 gallons high level liquid PCBs to SCA		160,000
$4.00/gallon		
° 25,000 gallons Decon water		75,000
° Asbestos		UNKNOWN
° Ash (DIOXINS & FURANS)		UNKNOWN
15% contingency		67,000
SUBTOTAL	$	516,000

F. PERSONNEL

EXTRAMURAL

1. Cleanup Contractor		
° Site Administration (PM, PCS, Secretary)		$ 120,000
° Foremen (Three)		120,000
° Crew (Decon Tech, 6 Equipment Operators, 15 Cleanup Techs)		850,000
2. Technical Assistance Team		
° 2 TATs for 4 months		125,000
	15% contingency	182,000
	SUBTOTAL	$1,397,000
	Extramural Total	$3,486,000

INTRAMURAL

1. U.S. EPA Direct Costs 4,000 hrs x $30		120,000
° 1 OSC for 4 months		
° 1 Assistant OSC for 4 months		
° Public Affairs		
2. U.S. EPA Indirect costs 4,000 hrs x $61.		244,000
	Intramural Total	$ 364,000
	GRAND TOTAL	$3,850,000

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